

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION**

RAYSHAN WATLEY, (347-921)	:	Case No. C1-01-739
	:	
Plaintiff,	:	
v.	:	JUDGE SUSAN DLOTT
	:	
MONA PARKS, et al.	:	MAGISTRATE JUDGE PERELMAN
	:	
Defendants.	:	

**DEFENDANTS' RESPONSE TO PLAINTIFF'S STATEMENT
IDENTIFYING DOCUMENTS NEEDED FOR DISCOVERY**

Plaintiff has identified medical records, informal complaints, grievances, and appeals as the documents that he still needs for discovery. Defendants submit that Plaintiff has had the opportunity to obtain the needed documents. First, Plaintiff reviewed his medical records on more than one occasion from the date of August, 2000 until the present in this case as well as in case no. C-1-02-244. He could copy any and all of the records at a cost of five cents per page. He is now asking to see his medical file, which he had already seen in this and another of his cases. Second, he wants a copy of his informal complaints and grievances regarding the very claim that he was making in this case. Plaintiff should already have a copy of the informal complaints and grievances, since there are four copies of informal complaints and three copies of grievances. The original informal complaints, grievances, and appeals were written by him and the responses to those documents were sent to him. Since exhaustion of administrative remedies is a requirement before filing a case pursuant to the Prison Litigation Reform Act (PLRA), 42 U.S.C. §1997e, he must already have the necessary

documentation and may even have attached them to his complaint.¹ However, if the Court deems it necessary, Defendants will provide them to Plaintiff.

Respectfully submitted,

JIM PETRO
Attorney General of Ohio

s/ MARIANNE PRESSMAN
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CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing was forwarded to Plaintiff, inmate Rayshan Watley, #347-921, at Southern Ohio Correctional Facility, P.O. Box 45699, Lucasville, Ohio 45699 by regular U.S. mail this 17th day of February, 2004.

s/ MARIANNE PRESSMAN
MARIANNE PRESSMAN (0059512)
Assistant Attorney General
Corrections Litigation Section

¹ Defendants were not served a copy of any attachments, if there were any.